

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

*Felony*

UNITED STATES DISTRICT COURT

APR 29 2014

for the

Southern District of Texas

David J. Bradley, Clerk of Court

United States of America

v.

Case No.

*B-14 423-MJ*

Jesus Pecina Chaires

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 7, 2014 in the county of Cameron in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

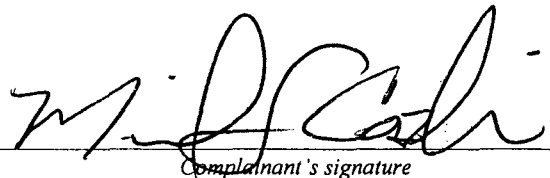
21 U.S.C. 841(a)(1)

*Offense Description*

Knowingly or intentionally possess with the intent to distribute approximately 70.12 kilograms of marijuana, a schedule I controlled substance.

This criminal complaint is based on these facts:

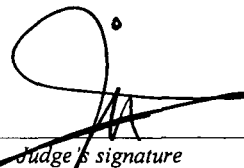
See attached affidavit.

☒ Continued on the attached sheet.

*Complainant's signature*

Michael S. Coblin, FBI Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: April 29, 2014City and state: Brownsville, Texas

*Judge's signature*

Ignacio Torteja III, United States Magistrate Judge

*Printed name and title*

B-14-423-MJ

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael S. Coblin, being duly sworn, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since August 2012. I am currently assigned to conduct criminal investigations and have served in this position since January 2013. My present responsibilities include the investigation of violations of federal law involving violent crimes, public corruption activities, and narcotics trafficking. I have completed FBI training in the investigation of criminal matters.

2. I submit that on the basis of the facts set forth in this affidavit there is probable cause to believe that on or about April 7, 2014, in the Southern District of Texas, the defendant, Jesus Pecina Chaires, did violate 21 U.S.C. 841(a)(1), possession with intent to distribute a controlled substance (marijuana).

3. This affidavit is based on my personal knowledge, my review of records and other materials obtained during the course of this investigation, and on information provided to me by other investigators during the course of this investigation.

4. On April 7, 2014, a FBI Task Force Officer observed an unknown Hispanic male park a brown Ford van in a supermarket parking lot in Brownsville, Texas. The unknown male exited the vehicle while talking on a cell phone and nervously looking in all directions. The man walked to the edge of the parking lot and entered the passenger side of a blue Mercury, which then departed the area. The officer then observed an adult male, adult female, and three small children enter the van and drive off. The officer followed the vehicle and observed that it had a broken tail light. While the Officer followed the vehicle he witnessed it driving in circles in a parking lot, taking indirect routes to major frontage roads, and driving very slowly with frequent braking.

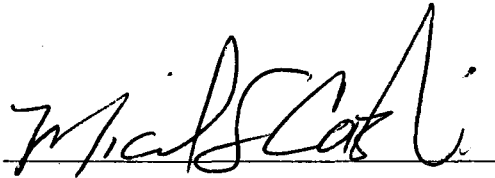
5. A vehicle drop off, and surveillance detection routes, like the incidents described above, are common methods employed by drug traffickers in order to identify and elude law enforcement and rival drug traffickers.

6. After witnessing the above activity the officer pulled behind the van, which was parked

in a shopping center parking lot, and activated his emergency lights. As the officer approached the van the driver opened his door. The officer immediately smelled the odor of fresh marijuana coming from the vehicle. The officer asked the driver if he had any marijuana, and the driver said that he did. The officer detained the man and conducted a probable cause search of the vehicle, where he found nine bundles of marijuana wrapped in clear plastic and covered with black trash bags.

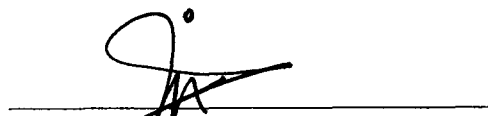
7. The man detained by the officer was Jesus Pecina Chaires, date of birth [REDACTED] 1978. The marijuana taken from the vehicle weighed approximately 70.12 kilograms.

8. It is my belief, based on my background and experience, and the aforementioned information provided to me by witnesses and other federal law enforcement officers, that Jesus Pecina Chaires violated 21 U.S.C. 841(a)(1), possession with intent to distribute a controlled substance.



Michael S. Coblin  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me on this 29<sup>th</sup> day of April, 2014.

  
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Ignacio Torteya, III  
United States Magistrate Judge